

BOIES SCHILLER FLEXNER LLP

David Boies (admitted *pro hac vice*)
333 Main Street
Armonk, NY 10504
Tel.: (914) 749-8200
dboies@bsfllp.com

Mark C. Mao, CA Bar No. 236165
mmao@bsfllp.com
44 Montgomery St., 41st Floor
San Francisco, CA 94104
Tel.: (415) 293-6800
mmao@bsfllp.com

SUSMAN GODFREY L.L.P.

Bill Carmody (admitted *pro hac vice*)
bcarmody@susmangodfrey.com
One Manhattan West, 50th Floor
New York, NY 10001
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com

MORGAN & MORGAN

John A. Yanchunis (admitted *pro hac vice*)
jyanchunis@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505

*Counsel for Plaintiffs; additional counsel
listed in signature blocks below*

COOLEY LLP

BENEDICT Y. HUR (SBN: 224018)
bhur@cooley.com
SIMONA AGNOLUCCI (SBN: 246943)
sagnolucci@cooley.com
EDUARDO E. SANTACANA (SBN: 281668)
esantacana@cooley.com
ARGEMIRA FLOREZ (SBN: 331153)
aflorez@cooley.com
HARRIS MATEEN (SBN 335593)
hmateen@cooley.com
3 Embarcadero Center, 20th Floor San Francisco,
California 94111-4004
Telephone: (415) 693-2000

Counsel for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL
CATALDO, JULIAN
SANTIAGO, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,
v.

GOOGLE LLC,
Defendant.

Case No. 3:20-cv-04688-RS

**JOINT STIPULATION AND REQUEST
FOR EXTENSION OF TIME TO
OPPOSE THE MOTIONS *IN LIMINE***

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively the “Parties,” submit this joint stipulation.

WHEREAS, on June 23, 2025, the Court continued the Parties’ Final Pretrial Conference for one week to July 30, 2025 at 9:30 AM;

WHEREAS, under the existing schedule, the Parties filed their motions in limine on June 24, 2025 and must file any brief opposing the motions *in limine* on or before July 3, 2025;

WHEREAS, Google filed twelve motions in *limine*;

WHEREAS, Plaintiffs now seek a one-week extension for the Parties to file responses in opposition to the motions *in limine* from July 3, 2025 to July 10, 2025;

WHEREAS, Google does not oppose Plaintiffs’ request;

WHEREAS, the existing schedule does not allow for reply briefs, and there will be no reply briefs to either Party’s motions in *limine*;

WHEREAS, the Parties are also actively meeting and conferring to hopefully resolve some of the motions and reduce some burden on the Court;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties, to request the Court for a one-week extension to respond to the extensive briefing on the motions *in limine* by July 10, 2025.

A Proposed Order is Submitted concurrently herewith.

IT IS SO STIPULATED.

Dated: June 27, 2025

Dated: June 27, 2025

BOIES SCHILLER FLEXNER LLP

COOLEY LLP

By: /s/ Mark C. Mao

By: /s/ Eduardo E. Santacana

David Boies (admitted *pro hac vice*)
333 Main Street
Armonk, NY 10504
Tel.: (914) 749-8200
dboies@bsflp.com

BENEDICT Y. HUR (SBN: 224018)
bhur@cooley.com
SIMONA AGNOLUCCI (SBN: 246943)
sagnolucci@cooley.com
EDUARDO E. SANTACANA (SBN: 281668)
esantacana@cooley.com
ARGEMIRA FLOREZ (SBN: 331153)
aflorez@cooley.com
HARRIS MATEEN (SBN 335593)

Mark C. Mao, CA Bar No. 236165
Beko Reblitz-Richardson, CA Bar No. 238027
44 Montgomery St., 41st Floor

San Francisco, CA 94104
Tel.: (415) 293-6800
mmao@bsfllp.com
brichardson@bsfllp.com

hmateen@cooley.com
3 Embarcadero Center, 20th Floor San
Francisco, California 94111-4004
Telephone: (415) 693-2000

James Lee (admitted *pro hac vice*)
Rossana Baeza (admitted *pro hac vice*)
100 SE 2nd St., 28th Floor
Miami, FL 33131
Tel.: (305) 539-8400
jlee@bsfllp.com
rbaeza@bsfllp.com

*Counsel for Defendant Google
LLC*

Alison L. Anderson, CA Bar No. 275334
M. Logan Wright, CA Bar No. 349004
2029 Century Park East, Suite 1520
Los Angeles, CA 90067
Tel.: (213) 995-5720
alanderson@bsfllp.com
mwright@bsfllp.com

SUSMAN GODFREY L.L.P.

Bill Carmody (admitted *pro hac vice*)
Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander P. Frawley (admitted *pro hac vice*)
Ryan Sila (admitted *pro hac vice*)
One Manhattan West, 50th Floor
New York, NY 10001
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com
rsila@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: (310) 789-3100
abonn@susmangodfrey.com

MORGAN & MORGAN

John A. Yanchunis (admitted *pro hac vice*)
Ryan J. McGee (admitted *pro hac vice*)
Michael F. Ram, CA Bar No. 104805
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
rmcgee@forthepeople.com
mram@forthepeople.com

Counsel for Plaintiffs

ATTESTATION

I, Mark Mao, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 27, 2025

By: /s/ Mark C. Mao

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, SAL
CATALDO, JULIAN
SANTIAGO, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,
v.

GOOGLE LLC,
Defendant.

Case No. 3:20-cv-04688-RS

**[PROPOSED] ORDER GRANTING
JOINT STIPULATION REQUESTING
TO EXTEND TIME TO RESPOND TO
MOTIONS *IN LIMINE***

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

Pursuant to the stipulation of the Parties, the Court hereby **ORDERS** that the Parties' responses in opposition to the motions *in limine* are now due by July 10, 2025.

IT IS SO ORDERED.

Dated: _____

The Honorable Richard Seeborg
Chief Judge of the U.S. District Court for the
Northern District of California